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July 30, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Written Ex Parte Letter, WT Docket No. 10-4

Dear Ms. Dortch:

Surecall, through its counsel, urges the Commission to act expeditiously in adopting an order that addresses the long standing issue of removing the personal use restriction for wideband Consumer Signal Boosters. The near-unanimous record in this proceeding strongly supports the repeal of the personal use restriction in order to ensure that small businesses, entrepreneurs, and commercial entities have uninterrupted access to wireless communications service to support their customers and their internal operations.

For the past five years, Consumer Signal Boosters that comply with the Commission's Network Protection Standard ("NPS") have been used in a wide range of setting by consumers, including in multiple dwelling units where individual boosters support wireless services for multiple carriers. In each of these use cases, NPS-compliant boosters have operated successfully without resulting in harmful interference to wireless networks, demonstrating that NPS-compliant boosters can be employed safely in enterprise environments as well.

The sole issue to be resolved by the Commission is the manner in which wideband signal boosters will be registered in order to provide transparency for wireless carriers. All parties appear to agree that a centralized registration system would be most effective, one that would permit each wireless carrier to extract the registrant data relevant to its network.

Wilson Electronics has offered to host such a registration database.¹ The database, however, will be populated with identifying information for the customers of each booster manufacturer. Such data is exceedingly proprietary and could not be placed at risk of disclosure to any competing booster manufacturer, no matter how well intentioned. Further, the registration database must be entirely neutral for consumers, lacking any reference to a particular booster

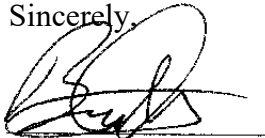
¹ See Reply Comments of Wilson Electronics, WT Docket No. 10-4 (June 18, 2018).

Marlene H. Dortch
July 30, 2018
Page 2

manufacturer in its public appearance or in its URL address. Put simply, if Wilson or any non-neutral party is given responsibility or control over the registration database, it will not be possible to resolve the proprietary and competitive concerns. Given these facts, it is necessary for a neutral third party to host the registration database, such as CTIA or the Commission. Fortunately, both CTIA and the Commission have set up and managed registration databases for other (often similar) purposes. Therefore, Surecall urges the Commission to resolve this issue expeditiously so that enterprise uses of wideband signal boosters and their customers can benefit from a much greater level of access and reliability in wireless communications services.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,

By: 
Bruce A. Olcott
Counsel to Surecall